

OGC Has Reviewed

DD/A Registry

76-6231

MEMORANDUM FOR: Deputy Director of Central Intelligence

FROM : F. W. M. Janney
Director of Personnel

VIA : Deputy Director for Administration

SUBJECT : Survey of Interest in Facilities for Physical
Conditioning, Recreational and Social Activities

John E. Blake
17 DEC 1976

STATINT

1. This memorandum is for your information.

2. A survey questionnaire was forwarded with Employee Bulletin dated 27 October 1976, asking for the opinions of all Headquarters employees on a number of questions related to the providing of facilities for physical conditioning, recreational and social activities. A copy of that survey, including notations of the responses, is attached. A total of 3,095 questionnaires were returned, representing [redacted] response. While not eliciting complete data on which to plan an ideal complex, the survey did provide some insight into what Agency employees would like to have, the extent to which they feel their employer should provide physical conditioning and recreational facilities, and their willingness to contribute funds for such facilities.

3. The first question on the survey asked the employee's opinion regarding the need for a multi-purpose activities center and what impact it would have on employee morale. Approximately 30% of the respondents indicated this was urgently needed and would greatly contribute to morale. Conversely, 10% felt this to be unnecessary and not an influence on employee morale. Over half of those who participated in the survey indicated moderate interest in an Agency multi-purpose center.

4. Question 2 attempted to determine employees' opinions on who should be permitted to use the facility. Approximately one out of four prefer use to be restricted to Agency employees. An equal number want to be able to bring in outside guests. Half of the responses indicated a preference for restricting admittance to Agency personnel and members of their immediate families.

5. Questions 3, 4, 5 and 6 were to determine how frequently, by whom, and at what time the center would be used. Most significant of the information gained from these questions was the fact that:

a. Almost half indicated they would utilize the facility frequently and an additional one-third said they would use it occasionally.

b. Approximately one out of four responded that family participation was not applicable to them.

c. The greatest expected use would be on weekends.

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6. An attempt was made in question 7 to determine the types of facilities desired. Choices were: indoor athletic, outdoor athletic, social (meeting and party rooms), and dining facilities. More than one preference could be marked. Indoor athletics was the overwhelming favorite with 2,415 votes. Outdoor athletics was second with about half as many votes. The remaining choices received significantly less responses. This question also asked for a write-in of preferred locations. This produced insignificant response except for over 100 employees who indicated Rosslyn.

7. Question 8 listed several possible activities that might be included in a multi-purpose center and asked for first, second and third preference to be indicated. The attached copy of the survey shows a tabulation of first, second and third place votes and a ranking based on the number of "first preference" votes. Indoor swimming, tennis, and bowling were most popular in that order. A surprisingly low eighth and twelfth places went to softball and football, two of EAA's most popular activities.

8. Questions 9, 10 and 11 attempted to elicit to what extent employees would be willing to support financially Agency athletic and recreational facilities. As a number of volunteered comments pointed out, it is difficult for one to state how much he or she will pay for use of a facility when the facility is not fully defined. It was considered essential, however, to obtain some expression from employees as to what extent they expected to share in the cost of the facilities. Regarding use of the facilities such as tennis courts, bowling alleys and swimming, employees were almost equally divided (approximately one out of three) on general membership dues only versus a combination "use fee" and "general dues." One out of four employees favored only the "fee per individual use" concept. Questions 10 and 11 addressed the attitude toward possible purchase of shares and annual dues. Very few employees indicated an interest in investing more than \$100 in either.

9. Item 12 on the survey asked for any comments or suggestions the employee wished to make. One out of three chose to do so. As might be expected, comments ran the gamut from "a great idea" and "should be like Pentagon facilities" to "a dumb idea" and "a waste of time and money." Some comments fell in between these extremes, indicating this was a nice idea but doubtful that it will ever come to pass. The question of who should be permitted use of the facilities drew many comments from those who are under cover. In strong terms they indicated outside participation would prevent their use. Of the constructive comments, two were most dominant - improve the exercise facilities already in existence in the Headquarters Building and provide exercise facilities in Rosslyn (and to a lesser extent in other buildings). Some who commented just wanted to point out the benefits (to the Agency as well as themselves) of exercise programs. Conversely, there were others who felt that the Government is being cheated out of an eight-hour day and employees should do their exercising (and recreating) on their

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SUBJECT: Survey of Interest in Facilities for Physical
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own time. Many wished to give a plug for their favorite sport by singling out tennis courts, or handball, or an indoor pool, or new softball fields, as a must. Those commenting against the proposal, although not a majority, were substantial and presented one or more of four arguments against increasing recreational facilities. Most prominent was the opinion that this is not the Agency's responsibility and would be an improper use of the taxpayer's money. Second was a strong concern that this would result in bad publicity for the Agency at a time when it can least afford it. Third was the idea that the providing of facilities would foster paternalism, clannishness, and inbreeding when more community participation by employees should be stressed. Fourth was the concern on the part of some that their work environment (office space) was already substandard and the providing of recreational facilities should be secondary to improving this situation.

10. In summary, the degree of employee interest expressed in the survey would not appear to provide overwhelming support for a recreational building. The survey does, however, indicate the strong interest that many employees have in fitness, exercise, and athletic activities and the desire to engage in these activities at their work location. There was also a frequent expression of opinion that the existing facilities should be improved and expanded and additional facilities should be made available to employees working in other than the Headquarters Building. It is therefore our intention to:

a. make the results of this survey available to the Board of Directors of the Employee Activity Association for their consideration in connection with EAA budget planning and future activities, and

b. present the results of the survey to the Deputy Director for Administration after which we will initiate discussions with him and appropriate personnel of his office regarding improvement of present exercise and athletic facilities, availability of space for exercise facilities in other buildings (especially Rosslyn), and inclusion of recreational activities in the planning of new buildings.

(Signed) F. W. M. Janney

F. W. M. Janney

Att

Distribution:

0 - Addressee

1 - ER

1 - DDA

1 - D/Pers

1 - DD/Pers

1 - C/BSA (r w/held)

STATINTL

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OP/BSA/ [redacted] :jp ac(14 Dec 76)



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EMPLOYEE BULLETIN

27 October 1976

SURVEY OF INTEREST IN FACILITIES FOR PHYSICAL CONDITIONING, RECREATIONAL AND SOCIAL ACTIVITIES

1. The Agency has a strong and continuing interest in the physical conditioning of its employees and in providing opportunities for recreational and social activities that are commensurate with security and cover requirements. This has resulted in the provision of physical fitness facilities wherever possible and in the strong management support that is provided to the Employee Activities Association (EAA).
2. While the use of appropriated funds is restricted in these areas and EAA's resources are limited, it is desired every effort be made to provide the best possible program within available resources. A review of other Federal civilian agencies has been made to determine their success in this regard and the facilities being provided to their employees. This review indicates that the Agency program ranks very high. However, there is always room for improvement.
3. Even during the early planning stages for the Headquarters Building, consideration was given to the possibility of providing a nearby multi-purpose physical conditioning, recreation and social center for employees and, possibly, their families. It was not feasible to carry through those plans for a variety of reasons. One of the major factors was a lack of sufficient private capital and that continues to be a significant problem today.
4. Before giving any further consideration to this matter, there is a need to determine the current interest and preferences of Agency employees. Would a multi-purpose center near the Headquarters Building have sufficient appeal, thus encouraging further action? If so, what should the center contain? Would employees be willing to participate and provide financial support? If not, are there smaller, single or dual-purpose facilities that are desired and can be supported? Where should they be located?
5. In order to find the answers to pertinent questions, the attached survey questionnaire has been prepared. The interest (or lack of interest) on the part of each employee will effect future decisions that are made on this matter. This is your opportunity to express your personal preferences. Please mark your answers to the survey questions, add any comments you would like to make, and forward via office mail to Room 1016 Ames Bldg. Your name is not required. The form should be returned no later than 17 November.

DISTRIBUTION: ALL EMPLOYEES

ADMINISTRATIVE - INTERNAL USE ONLY

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933	(29.6%)	()	Is urgently needed and would contribute greatly to the morale of employees
1826	(57.9%)	()	Would be nice to have and would help improve employee morale to some degree
330	(10.5%)	()	Is unnecessary and would have no influence on employee morale
64	(2.0%)	()	No opinion
3153	(100 %)		

2. Regarding eligibility to use an Agency center or individual facilities, I would -

683	(22.5%)	()	Prefer that it be restricted to Agency personnel
1476	(48.7%)	()	Prefer that it be restricted to Agency personnel and members of their immediate family
673	(22.2%)	()	Prefer having the opportunity to bring in outside guests
199	(6.6%)	()	No preference
3031	(100 %)		

3. If a center or individual facilities were available, I -

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1388 (46.2%) () Would make frequent use of the facilities
987 (32.8%) () Would occasionally use the facilities
204 (6.8%) () Would rely primarily on other facilities
428 (14.2%) () Am not sure how often I would use them
3007 (100 %)

4. If family participation were provided, my family

461 (15.5%) () Would make frequent use of the facilities
1017 (34.2%) () Would occasionally use the facilities
309 (10.4%) () Would rely primarily on other facilities
501 (16.9%) () Am not sure how often family would use them
683 (23.0%) () Not applicable
2971 (100 %)

5. Family participation would be by -

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() Spouse

() Children - specify number by age group

525 _____ under 6

494 _____ 7-10

558 _____ 11-14

743 _____ 15 and over

183 () Other - indicate number _____

859 () Not applicable

6. I would use the center or facilities during -

281 () 0600 to 0800 hours

479 () 0800 to 1600 hours

835 () 1600 to 1800 hours

1716 () After 1800 hours

2205 () Weekends

7. The types of facilities I would find most beneficial are -

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2415

() Indoor athletic

1254

() Outdoor athletic

661

() Social (meeting and party rooms)

653

() Dining facilities

203

() No preference

Indicate location, if other than Headquarters Building area

DC = 16; Rosslyn = 107; Arlington = 7; [REDACTED] 33; Other = 95. STATINTL

8. Please indicate the three activities most wanted by you.

(Indicate your order of preference by writing 1st, 2nd, and 3rd)

1st	2nd	3rd	Rank*			1st	2nd	3rd	Rank
332	210	201	3	() Bowling	() Golf driving range	90	69	75	
77	40	78	10	() Billiards	() Softball	99	45	88	
450	374	305	2	() Tennis	() Football	23	15	25	
778	575	187	1	() Swimming, indoor	() Shuffleboard	12	4	25	
116	185	92	7	() Swimming, outdoor	() Social or game rooms	129	78	148	
185	90	136	5	() Dining	()				
68	54	57	11	() Meeting rooms & lounges					
291	139	140	4	() Racquetball-Handball					

*Ranking based on number of "first preference" votes.

9. If individual facilities such as tennis courts, bowling alleys or swimming pools were made available, I would prefer that payment for their use be on the basis of -

671	(22.7%)	<input type="checkbox"/> Fee per individual use
965	(32.7%)	<input type="checkbox"/> General membership dues permitting unlimited use of all facilities
1126	(38.2%)	<input type="checkbox"/> Combination of "use fee" and "general dues"
<u>189</u>	<u>(6.4%)</u>	<input type="checkbox"/> No preference
2951	(100 %)	

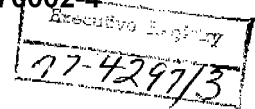
10. Regarding financial support of an Agency center, I would be willing to invest the following in shares -

404	<input type="checkbox"/> \$ <u>07</u> / 24
1042	<input type="checkbox"/> \$25
628	<input type="checkbox"/> \$50
647	<input type="checkbox"/> \$100
27	\$101+

11. In addition to shares, I would be willing to pay annual dues of -

	<u>Family</u>	<u>Self-Only</u>	
231	() \$0-24	() \$0-24	316
616	() \$25	() \$25	509
493	() \$50	() \$50	249
377	() \$100	() \$100	129
11	\$101	\$101+	9

12. Please indicate below any comments or suggestions you may have on this matter:



10 June 1977

NOTE FOR: Deputy Director for Administration

SUBJECT: Physical Conditioning and Recreational Facilities

Jack:

Attached is an OGC opinion dated 10 June by [REDACTED] which recommends that we either (1) go to Congress for an appropriation for the proposed facilities or (2) request the opinion of the Comptroller General on our authority to expend general funds for these purposes.

STATINTL

The DDCI would like to meet with you and [REDACTED] to discuss this on Friday, 17 June at 11:00 a.m.

STATINTL

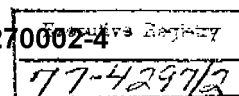
[REDACTED]
Assistant to the Deputy Director

STATINTL

Attachment:
ER 77-4297/2

cc: D/Pers
(Attn: [REDACTED])

TATINTL



OGC 77-3706

10 June 1977

MEMORANDUM FOR: Deputy Director of Central Intelligence

STATINTL FROM:

[REDACTED]
Associate General CounselSUBJECT: Use of Appropriated Funds for Physical Conditioning
and Recreational FacilitiesREFERENCE: Memo for DDCI, Via DDA, fm D/OP, dtd 9 May 77,
Subj: Facilities for Physical Conditioning and
Recreation

1. This is in response to your request for a review of the legality of spending appropriated funds for certain employee physical conditioning and recreational facilities. Referent memorandum suggests the following expenditures: \$600 for walking and jogging trails; \$15,100 for an electric gate, gravel road and 20-car parking lot; \$50,000 for four tennis courts; \$9,200 for a basketball court; \$350 for a volleyball court; \$5,500 for a handball court; and \$7,550 for drinking fountains and trash containers.

2. Article I, Section 9, Clause 7 of the Constitution, which provides, in pertinent part, "No Money shall be drawn from the Treasury, but in Consequence of Appropriations made Law; . . .," imposes a limitation on the disbursing authority of the executive branch unless funds have been duly appropriated by an act of Congress. Cincinnati Soap Co. v. United States, 301 U.S. 308, 321 (1937). By virtue of this provision, Congress has broad discretionary power to prescribe conditions and details attendant to expenditures of appropriated funds. Id at 322. The purposes of an appropriation, as well as the terms and conditions under which it is made, are matters solely for the Congress and neither the executive nor judicial branches are entitled to interfere or usurp this constitutional authority. Spaulding v. Douglas Aircraft Co., 60 F. Supp. 985, 988; aff'd, 154 F.2d 419 (9th Cir. 1946); see also Hart's Case, 118 U.S. 62 (1886). Accordingly, no Federal officer, including the President, can legally expend funds without, or in a manner inconsistent with, a congressional appropriation. Reese v. Walker, 52 U.S. 272, 291 (1850).

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3. The basic statute governing the use of appropriated funds is found at 31 U.S.C. 628 which provides:

Except as otherwise provided by law, sums appropriated for the various branches of expenditure in the public service shall be applied solely to the objects for which they are respectively made, and for no others.

The thrust of this provision is that inherent in the constitutionally based appropriation process is the understanding that when Congress appropriates funds to the various departments to carry out the functions and responsibilities assigned to each, it does so on the basis of an informed consent regarding the purpose or purposes for which the funds will be spent. Obviously, it is impossible for the Congress to be fully informed on every minor item of expenditure by each department of the Government and accordingly, certain rules of interpretation have grown up within the body of appropriations law, primarily as promulgated by the Comptroller General of the United States. Often he has been called upon to provide opinions on various and sundry expenditures sought to be made under generic, housekeeping or maintenance provisions of appropriations acts and in doing so has tried to find some logical nexus between the proposed expenditure and the purpose of the appropriation. In the absence of such a nexus, the proposed expenditure fails for want of legal authority.

4. The touchstone opinion of the Comptroller General in the area of using generally appropriated funds to provide recreational facilities for employees is found at 18 Comp. Gen. 147, 10 August 1938. In responding to the Secretary of War who wanted to use appropriated funds to provide recreational facilities for a Government workforce which was constructing a project on Midway Island, the Comptroller General held:

While the furnishing of recreational facilities may be highly desirable, particularly in a place such as referred to in your letter, they constitute expenses which are personal to the employees and which are not permitted to be furnished from appropriated funds unless provided in the appropriation either specifically or by necessary implication... In the present case, while it appears that the proposed expenditures would provide recreational and entertainment facilities for the employees, there has been no showing made or even any allegations that such expenditures are really within the purview of the appropriation for rivers and harbors improvements proposed to be used

for the prosecution of the project in question, or that such expenditures are essential in or even reasonably incident to prosecuting the project. Therefore, the question submitted is answered in the negative.

Ten years later, he applied the same reasoning to a question on the availability of appropriated funds to pay the salaries of civilian employees who were to develop, organize and supervise recreational programs for civilian employees of the Navy Department:

It may be stated as a general rule that the use of appropriated funds for objects not specifically set forth in the appropriation act but having a direct connection with and essential to carrying out the purposes for which the funds were appropriated is authorized. However, while recreational and entertainment programs for Federal employees doubtless may be desirable in certain instances, such as referred to in your letter, it would seem that, at most, they have an indirect bearing upon the purposes for which the appropriations were made. Hence, in the absence of a clear expression on the part of the Congress that appropriated funds be used in connection with recreational and entertainment activities for Federal employees, this Office would not be warranted in authorizing such use, notwithstanding the administrative determination of desirability of the matter. Accordingly, your question is answered in the negative. 27 Comp. Gen. 679 (12 May 1948)

This rigid position of the Comptroller General has continued and has been relaxed in only a few instances. Via an unpublished opinion, B-86148, 8 November 1950, he turned down use of appropriated funds for incentive background music at three Navy installations. In another, B-126374, 14 February 1956, citing 18 Comp. Gen. 147, he denied reimbursement to a Department of State officer who had spent \$53.50 to hire a boat and crew for a recreational trip on the Red Sea. A 23 May 1958 opinion, B-135817, directed a certifying officer not to certify a claim for \$17.95 for a volleyball, net and horseshoes purchased by the Forest Service for off-duty use by its employees at a remote cite; the certifying officer believed a specific appropriation permitted the expenditure in question, and argued that unless the equipment was provided and the men encouraged to engage in "recreational activity of a wholesome nature," they would become restless

and sluggish due to inactivity, and this, in turn, would detract from the effectiveness of the Forest Service training. Citing again 18 Comp. Gen. 147, the Comptroller General held that, "at most, the furnishing of such equipment has only an indirect bearing upon the purposes for which the appropriation was made."

5. An example of the required logical nexus suggested previously is found in an opinion where the Comptroller General held that a specific appropriation act, the Mexican-American Treaty Act of 1950 which authorized the construction of a number of items including "recreational facilities for the officers, agents, and employees of the United States," therefore included, by necessary implication, an authorization to purchase playground equipment for the children of said employees. He ruled further, however, that the people who used the recreational facilities should be charged because, in most circumstances, they would be expected to furnish such equipment or facilities at personal expense; he did not require a charge for use of playground equipment. 41 Comp. Gen. 264, 24 October 1961.

6. Those few opinions in which this rigid prohibitive position has been relaxed provide little significant support for the proposed expenditures set out in the first paragraph. In one, where a Federal Aviation Administration appropriation specifically provided for "the construction and furnishing of quarters and related accommodations" in an isolated sector of the Panama Canal Zone, the Comptroller General interpreted the appropriation "as including certain limited recreational facilities such as tennis courts and playground facilities." B-173009, 20 July 1971 [Emphasis added.]. The opinion contained a number of criteria which distinguish it from the general rule. First, there was a specific appropriation which lent itself to the desired interpretation -- the "related accommodations" emphasized above; second, there had been an administrative determination that the absence of recreational facilities adversely impacted on the ability of the FAA to perform its functions at the location; and third, the facts underlying the administrative determination appeared compelling -- the FAA housing sites were isolated and not close to any recreational facilities and the absence of some form of recreation had caused dependent teenagers to turn to narcotics and vandalism and this, in turn, hampered personnel recruitment. The Comptroller General did not believe, however, that "related accommodations" included the construction of a gymnasium.

7. Other departures from the position are as follows: Based on a determination of the Commissioner, Bureau of Public Debt, that "scientifically programed music" would improve employee morale, increase employee productivity and result in savings to the Government, the Comptroller General found that such

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music was a "necessary expense" and permitted payment of \$61.00 per month to MUZAK, thus reversing B-86148 of 8 November 1950. 51 Comp. Gen. 797, 6 June 1972. He also permitted an expenditure of \$400 for a television set as a "necessary expense" in carrying out the purposes of an EPA appropriation. The television set was to be installed on an EPA boat which plied the waters of the Great Lakes taking water samplings. The opinion noted that the EPA scientists on board were furnished lodging and meals and thus, compensated only \$1.00 per diem and, that commercial lodgings would normally have included a television set. 54 Comp. Gen. 1075, 20 June 1970. As is evident, absent a specific appropriation providing for physical conditioning or recreational facilities or, a clear nexus between Agency functions and physical conditioning and recreating, expenditures for these purposes are generally held to be contrary to law.

9. The first OGC opinion (16 November 1951) on this question was written by Lawrence Houston and supported by a memorandum for the record on the applicable law. Referring to the 1938 Comptroller General opinion cited in paragraph 4, supra, Houston advised:

...The use of funds for this purpose has been denied in spite of the dearth of such facilities at the base, distance from the base to the closest public facilities, or the effect on the morale of employees in the absence of such facilities.

In view of this restrictive interpretation, justification for this Agency to expend funds for this purpose must be based upon unique operations, which could take us out of the purview of the decisions.

* * * *

Fundamentally, the justification for such expenditures is a factual determination for your...[the then DDS]...consideration.

On the basis of this opinion determinations have apparently been made which permitted expenditures of appropriated funds for the physical fitness room and the limited equipment within it. According to a 5 August 1976 memorandum by the Office of Personnel, the physical fitness room was "established in order to provide for the conditioning of employees who have physically demanding official duties and those who are assigned to TDY standby status." That same memorandum asked that "our authority be reconfirmed to assign employees paid from appropriated funds to the EEA Coordinator function...and to the Physical Fitness Room." An OGC opinion dated 14 October 1976 in response to this request

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held that although appropriated funds could not be used for "purely recreational activities" physical fitness activities could be supported by the use of appropriated funds "where such expenditure is essential to the mission for which the funds were appropriated." It concluded that security and personnel requirements justified the continued use of appropriated funds for the EAA Coordinator Function and Physical Fitness Room. Upon reexamination it is our view that opinion stretched our spending authorities close to their outer limits, and it may even be that the opinion should be reconsidered, or at least bolstered by factual determinations which we understand were not made, tying the activities and expenditures in question to the Agency's mission. That is not to say the opinion is in error and indeed there are functional distinctions between a limited Physical Fitness Room and recreational facilities of the type proposed.

10. An argument might be made, of course, that the functions of this Agency and particularly certain responsibilities of clandestine services officers require that they be in excellent condition, and therefore, as a necessary and essential function of the Agency the Director has determined that a limited physical fitness facility is required. The thought here is that expenditures of the nature sought might be made from the Agency's confidential funds authority. Careful examination should be made, however, of the arguments and the underlying justifications before recourse to that authority. It could be argued, for example, that certain small segments of the DDO such as [REDACTED], OTS and others who have STATINT duties which require substantial physical exertion must maintain excellent physical health to be able to perform their duties. In addition, those Office of Security personnel who are assigned to protective responsibilities fall into this category. In fact, it is possible that the Director along with the Office of Medical Services could establish a program and direct the maintenance of certain physical standards by personnel in these categories. On the other hand, it could be argued that while this very small percentage of Agency personnel are required to maintain good physical conditioning and therefore, a physical fitness program via appropriated funds is necessary, that the large majority of Agency employees have no such requirements. [REDACTED] FOIA

11. In summary, it is the opinion of this Office that arguments cannot fairly be made to justify the expenditure of appropriated funds for the purposes enumerated in referent memorandum. Two courses of action appear open to the Agency at this time. First, request of the Congress a specific authorization

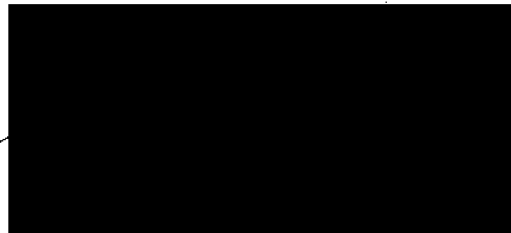
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to expend funds for the proposed purposes or, in the alternative, for the existing limited facility. I am of the opinion that given the modest amounts which are proposed to be expended, conceivably a case could be made which would satisfy the Congress as to the "necessity" for such facilities. A second course open to the Agency is to view this opinion as advisory in nature and prepare an inquiry for review by the Comptroller General using as justification as many of those things which can fairly be said to be supportive of the proposition that the facilities in question are "necessary or essential" to the mission of the Agency. This Office would welcome the opportunity to draft the inquiry to the Comptroller General if you believe that is a proper course to follow and, I would suggest a preliminary informal approach before we commence drafting.

12. This has been a most difficult opinion. Clearly, there is a substantial benefit to be gained by making the proposed facilities available to Agency employees on the compound for use before, during and after work hours, but it is imperative, I believe, to steer the Agency in a course on this question which is legally correct. I am confident that most of the proposed facilities can eventually be constructed either via the appropriation process or the suggested Comptroller General opinion and, the same will have been effected without any possible charge of illegality or impropriety.

13. If I can be of any further assistance, please advise.



STATINT

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ROUTING AND RECORD SHEET

SUBJECT: (Optional)

FROM:	EXTENSION	NO.
[REDACTED]		DATE 10 June 1977
TO: (Officer designation, room number, and building)	DATE	OFFICER'S INITIALS
	RECEIVED	FORWARDED
INTL K 13 JUN 1977 Director of Personnel Attn: [REDACTED]		
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15.		

Ben:
Per our conversation,
[REDACTED] opinion.

Meeting scheduled
for Friday, 17 June
11:00 A.M.
with Mr. Knoche.